

Varian, Inc.
3120 Hansen Way
Palo Alto, CA 94304-1030, U.S.A.
Phone: 650.213.8100
Fax: 650.213.8200
<http://www.varianinc.com>

January 30, 2004

United States Environmental Protection Agency
Martha Bosworth, Enforcement Coordinator
Office of Site Remediation and Restoration (HBS)
One Congress Street, Suite 1100
Boston, MA 02114



ATTN: Wells G&H Case Team

Dear Ms. Bosworth,

Attached is the Varian, Inc. response to the Whitney Barrel Company Requests for Information dated December 15, 2003 that were sent to our site at 121 Hartwell Avenue in Lexington, Massachusetts and to our corporate offices at 3120 Hansen Way in Palo Alto, California.

If you have any questions concerning the information provided or if you require any additional information, please feel free to contact me. My telephone number is 650-424-4710, facsimile number is 650-856-8356, and e-mail address is dan.peixoto@varianinc.com.

Sincerely,



Dan W. Peixoto
Corporate Environmental Manager

0068-0015

1. General Information About Respondent (present time unless otherwise indicated.)

a. Full legal name and mailing address of the Respondent.

Varian, Inc.
3120 Hansen Way
Palo Alto, CA 94304-1030

b. Person answering these questions on behalf of Respondent:

Daniel W. Peixoto
Corporate Environmental Manager
3120 Hansen Way
Palo Alto, CA 94304-1030
650-424-4710
dan.peixoto@varianinc.com

c. Designated individual for all future correspondence concerning this Site, including any legal notices, please so indicate here by providing that individual's name, address, and telephone number.

Dan Peixoto (see contact information above) is the designated individual for all future correspondence concerning the Site.

d. Names of all Superfund sites in Region I (New England) for which Respondent has received a 104(e) Request for Information Letter from EPA.

Varian, Inc. has not received any other 104(e) Request for Information Letters from EPA Region I.

2. Respondent's Legal Status (present time unless otherwise indicated.)

a. If the Respondent has ever done business under any other name;

- i. list each such name; and
- ii. list the dates during which such name was used by Respondent.

Varian, Inc. has not done business under any other name.

b. If Respondent is a corporation, provide:

- i. the date of incorporation; January 7, 1999
- ii. state of incorporation; and Delaware
- iii. agent for service of process. C T Corporation System
818 West Seventh Street
Los Angeles, CA 90017

c. If Respondent was a business entity other than a corporation, provide:

Not applicable.

d. If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate relationship, including but not limited to:

- i. a general statement of the nature of the relationship;

Varian, Inc. (Respondent) is one of two businesses spun off from Varian Associates, Inc. on April 2, 1999. Also on that date, the remaining Varian Associates, Inc. entity changed its name to Varian Medical Systems, Inc.

Until April 2, 1999, the business of Varian, Inc. (Respondent) was operated as the Instruments business of Varian Associates, Inc. ("VAI"). The facility at 121 Hartwell Avenue, Lexington, Massachusetts and the facility at 78 Blanchard Road, Burlington, Massachusetts were part of that Instruments business.

Just prior to April 2, 1999, VAI contributed its Instruments business to Varian, Inc., a new wholly-owned subsidiary. On April 2, 1999, VAI distributed to its stockholders one share of stock of Varian, Inc. for each share of stock held in VAI. Varian, Inc. thus became a separate, publicly-traded company on April 2, 1999. Immediately following this "spin off" transaction, VAI changed its name to Varian Medical Systems, Inc.

This "spin off" transaction was accomplished under the terms of a Distribution Agreement, pursuant to which Varian, Inc. (Respondent) is required to assume, pay, perform and discharge all liabilities relating to the businesses and facilities which became part of Varian, Inc., including the facility at 121 Hartwell Avenue, Lexington, Massachusetts and the former facility at 78 Blanchard Road, Burlington, Massachusetts.

- ii. the dates such relationship existed;

This relationship continued until April 2, 1999.

iii. the percentage of ownership of Respondent that is held by such other entity; and

Zero.

iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.

Varian Medical Systems, Inc.
3100 Hansen Way
Palo Alto, CA 94304

e. Identify all of Respondent's predecessors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest.

See response to 2.d.i. above.

f. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:

Not applicable – The change in legal entity was not the result of an asset purchase or merger.

g. If Respondent has filed for bankruptcy, provide:

Varian, Inc. has not filed for bankruptcy.

3. Respondent's Operations ((1950-1985) unless otherwise indicated. All questions in this Section refer to facilities owned or operated by the Respondent within Massachusetts, Rhode Island, New Hampshire or Maine and to any other facility owned or operated by Respondent which had any business or other contractual relationship with Whitney Barrel Company.)

a. Provide the complete addresses of Respondent's plants and other buildings or structures where Respondent carried out its operations.

121 Hartwell Avenue
Lexington, MA 01728

78 Blanchard Road
Burlington, MA 01803

b. Provide a brief description of the nature of Respondent's operations at each location including:

i. the date such operations commenced and concluded;

Lexington site - The operations began in 1973 and continue as of 2004.

Burlington site – The operations began in 1984 and were relocated to the Lexington site in 1989.

ii. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location; and

Lexington site - Machining, welding, aqueous and solvent metal cleaning, painting, assembling metal parts, and testing.

Burlington site – Wave soldering, assembling, inspecting, and testing.

iii. the type of products manufactured, recycled, recovered, treated or otherwise processed in these operations.

Lexington site - The facility produces vacuum pumps, vacuum measurement devices, valves, and other related vacuum components.

Burlington site – The facility produced leak detectors, vacuum measurement devices, and valves.

c. Enclosure F provides a list of chemical constituents conclusively identified to date at the Site. For each facility identified in 3.a above, identify, to the best of your knowledge, any chemical constituents listed in Enclosure F that:

- i. would have been produced, processed, or used in connection with facility operations; or
- ii. would have been present in materials produced, processed, or used in connection with facility operations.

Lexington site:

C9-C18 Aliphatic Hydrocarbons (oils)

C11-C22 Aromatics Hydrocarbons (oils)
C19-C36 Aliphatics Hydrocarbons (oils)
C5-C8 Aliphatic Hydrocarbons (paint thinner)
C9-C10 Aromatics Hydrocarbons (paint thinner)
C9-C12 Aliphatic Hydrocarbons (paint thinner)
Copper
Lead (solder)
Iron (stainless steel)
Chromium (stainless steel)
Mercury
Nickel (stainless steel)
Iron (stainless steel)
Hexavalent Chromium
1,1,1-Trichloroethane
Acetone

Burlington site:

C9-C18 Aliphatic Hydrocarbons (oils)
C11-C22 Aromatics Hydrocarbons (oils)
C19-C36 Aliphatics Hydrocarbons (oils)
C5-C8 Aliphatic Hydrocarbons (paint thinner)
C9-C10 Aromatics Hydrocarbons (paint thinner)
C9-C12 Aliphatic Hydrocarbons (paint thinner)
Copper
Lead (solder)
Iron (stainless steel)
Chromium (stainless steel)
Nickel (stainless steel)
Acetone

d. If the nature or size of Respondent's operations changed over time, describe those changes, the dates they occurred, and the nature of the current business at each such location, including but not limited to a brief description of the major products or services Respondent manufactures or provides.

Lexington site – With the exception of the transfer of the “light manufacturing” portions of the Lexington operation that were transferred from Lexington to Burlington in 1984 and returned to the site in 1989, the nature or size of the operation did not change between 1973 when operations began at the site through 1985 the end of the period being investigated. Major products currently manufactured at the site are described in 3.b.iii. above.).

Burlington site - The nature or size of the operation did not change between 1984 when operations began at the site through 1989 when the operation was relocated back to the Lexington site.

e. List the products Respondent manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Lexington site - The facility produces vacuum pumps, leak detectors, vacuum measurement devices, valves, and other related vacuum components.

Burlington site - The facility produced leak detectors, vacuum measurement devices, valves.

f. In general terms, list the types of raw materials used in the operations.

Copper and stainless steel are the primary raw materials processed at both facilities.

g. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

i. the types of material used to clean/maintain this equipment/machinery; and

The primary use of cleaning materials was to clean the machining and metal working. The machines were cleaned with soap and water, household cleaners (Formula 409, etc.) and 1,1,1-trichloroethane.

ii. the monthly or annual quantity of each material used.

A relatively small amount of these materials were used in comparison to the amount of chemicals used for manufacturing. Approximate annual usage was:

Soap and water	24 gallons per year
Household cleaners (Formula 409, etc.)	4 gallons per year

h. Describe the methods used to clean up spills of liquid or solid material during operations, including but not limited to:

i. the type of materials spilled in operations;

Water soluble and oil based machining coolants

ii. the materials used to clean up these spills;

Usually paper towels or bulk absorbent (Speedy-Dri)

iii. the methods used to clean up those spills; and

Absorbing the spill with the paper towels or bulk absorbent.

iv. where the materials used to clean up those spills were disposed of.

Dry solids, paper towels or used bulk absorbent with absorbed coolant or oil were disposed of with the municipal trash.

i. Provide a schematic diagram or flow chart that fully describes and/or illustrates the operations at the Site.

See Attachment 1.

j. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel Company.

Tim Clough
Mark Baribeault
Carl Brooks
Bill Salter
Paul Latino
Ed Jackson

See Attachment 3 – Employee Data for additional information.

4. Respondent's Wastes and Waste Streams (including By-Products) All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.

a. Complete the enclosed "Waste Survey" checking each substance present in Respondent's wastes or by-products and providing all requested information for each such substance that is checked.

See Attachment 2 for the completed waste data surveys for the Lexington and

Burlington sites and a table that summarizes the data. We have conducted a diligent search and we were unable to locate any documents or information for waste disposal for the years of 1973, when the Lexington site began operations, until 1981, when manifests were required under RCRA for the shipment of hazardous wastes.

Based on interviews with longtime employees, the types and quantities of wastes generated from 1981 through 1985 are fairly representative of the wastes generated from 1973 through 1980. Based on their recollection, the wastes during the years 1973 through 1980 were sent to the site that is now known as Clean Harbors of Natick, Inc., 10 Mercer Road, Natick, MA 01760, MAD 980 523 203.

b. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- i. its physical state;
- ii. its name and chemical composition;
- iii. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- iv. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

See Attachment 2 - the completed waste data surveys for the Lexington and Burlington sites and a table that summarizes the data.

c. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:

- i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);

See Attachment 2 - the completed waste data surveys for the Lexington and Burlington sites and a table that summarizes the data.

- ii. the colors of the containers;

We have no documents or information concerning the colors of the containers. Longtime employees recall various colors of 55-gallon drums, including black and green.

- iii. any distinctive stripes or other markings on those containers;

We have no documents or information concerning distinctive stripes or other markings on the containers. Information (chemical names, labels, etc.) on drums emptied at the site would be painted over or otherwise removed before using the container for waste collection and disposal.

- iv. any labels or writing on those containers (including the content of those labels);

We have no documents or information concerning any labels or writing on the containers. The containers would be labeled indicating their contents and then often relabeled by the waste transporter to meet shipping requirements.

- v. whether those containers were new or used;

We have no documents or information concerning whether the containers were new or used. The practice at the site was to first use available empty containers and then purchase additional new or used containers as required.

- vi. where each type of waste was collected/stored, and

The wastes were stored in the area where the waste was generated or in the drum accumulation area.

- vii. if those containers were used, a description of the prior use of the containers.

We have no documents or information concerning the prior use of the used containers, but based on materials used in the operation they likely contained paint thinner, alcohols, solvents, and oils.

- d. Identify (see Definitions) the person(s) who was responsible for collecting and managing each type of waste.

During the 1970's and early 1980's the responsibility for the collection and management of the wastes was not assigned to any one person, it was a portion of the operation handled by manufacturing operations that generated the wastes and the maintenance and facilities departments.

- e. For each location, identify and provide copies of all surveys or studies conducted between 1950 and 1985 about its waste management practices including but not limited to disposal, treatment, storage, recycling, or sale of wastes.

We have no documents or information concerning any surveys or studies conducted between 1950 and 1985 about waste management practices.

f. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

See the response to 3.j. above.

5. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products)

All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated. Response to questions in this section must refer to all locations to which Respondent sent its wastes.

a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

Current responsibility - Tim Clough, Environmental Compliance Administrator. During the 1970's and early 1980's the responsibility for the collection and management of the wastes was not assigned to any one person, it was handled by the manufacturing departments that generated the wastes and the maintenance and facilities departments. Attachment 3 – Employee Data lists employees who were involved with waste management during the period being investigated (1950-1985).

b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

See the response to 5.a. above.

c. Identify (see Definitions) all individuals who currently have and those who have had responsibility for Respondent's environmental matters.

See the response to 5.a. above.

d. For the previous three responses, also provide each individual's:

- i. job title;
- ii. duties;

- iii. dates performing those duties;
- iv. supervisors for those duties;
- v. current position or, if such individual is no longer employed by Respondent, the date of the individual's resignation; and
- vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

See Attachment 3 – Employee Data for additional information.

e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:

- i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
- ii. the colors of the containers;
- iii. any distinctive stripes or other markings on those containers;
- iv. any labels or writing on those containers (including the content of those labels);
- v. whether those containers were new or used; and
- vi. if those containers were used, a description of the prior use of the containers.

The containers used to take each type of waste were then same containers that were used for the collection and storage of the waste. See response to 4.c. above.

f. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

We have no documents or information concerning contracts, agreements, or other arrangements for disposal, treatment, or recycling.

g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.

Not applicable

h. State where Respondent sent each type of its waste, including barrels and empty barrels, for disposal, treatment, or recycling.

We have no documents or information concerning the shipment of empty barrels for the period being investigated (1950-1985). The longtime employees recall that many of the empty drums were returned, with and without deposit, to the supplier (Service Chemical, 221 Sutton Street North Andover, MA 01845) and used for hazardous wastes shipped from the site. They also recall that the lids were cut off

many of the empty drums and these drums were used for scrap metal. A much smaller number of these "opened" drums were taken home by employees for use as barbecues.

See Attachment 2 for the hazardous waste disposal locations.

i. Identify (see Definitions) all entities and individuals who picked up waste, including barrels, from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).

We have no documents or information concerning the shipment of empty barrels for the period being investigated (1950-1985).

- 1981: Interex Corp.: 3 Strathmore Road, Natick MA 01760 MAD076590991
Chemical Waste Management, Inc.: 3 Strathmore Road, Natick MA 01760
MAD076590991
- 1982: Chemical Waste Management, Inc.: 3 Strathmore Road, Natick MA 01760
MAD980523203
Chemical Waste Management, Inc.: 5 Strathmore Road, Natick MA 01760
MAD980523203
- 1983: Chemical Waste Management, Inc.: 5 Strathmore Road, Natick MA 01760
MAD980523203
- 1984: Chemical Waste Management, Inc.: 5 Strathmore Road, Natick MA 01760
MAD980523203
Chemical Waste Management, Inc.: 10 Mercer Road, Natick MA 01760
MAD980523203
Clean Harbors Environ. Serv. Inc.: 1501 Washington St Braintree, MA
02184 MAD039322250
- 1985: Chemical Waste Management, Inc.: 10 Mercer Road, Natick MA 01760
MAD980523203
Clean Harbors Environ. Serv. Inc.: 1501 Washington St Braintree, MA
02184 MAD039322250
Clean Harbors Natick, Inc. 10 Mercer Road, Natick MA 01760
MAD980523203

We have no documents or information concerning the Waste Carriers used from 1973 through 1980. Based on interviews with longtime employees, the wastes during the years 1973 through 1980 were transported by the operation that is now known as Clean Harbors of Natick, Inc., 10 Mercer Road, Natick, MA 01760, MAD 980 523 203.

j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.

We have no documents or information indicating that we transported any of our wastes from either of our operations. Interviews with longtime employees also should no indication that we transported any of our wastes from either of our operations.

k. For each type of waste, specify which Waste Carrier picked it up.

With the exception of the waste transported by Clean Harbors Environ. Serv. Inc. (1501 Washington St Braintree, MA 02184 MAD039322250) to to SCA Services/Recycling Industries In Braintree MA (now known as Clean Harbors of Braintree, Inc. 385 Quincy Avenue, Braintree, MA 02184 MAD 053 452 637) all wastes were transported by the site indicated in Attachment 2 with the Waste Survey and summary sheet.

l. For each type of waste, state how frequently each Waste Carrier picked up such waste.

Each waste carrier picked up waste 3 to 5 times per year,

m. For each type of waste state the volume picked up by each Waste Carrier (per week, month, or year).

See Attachment 2 with the Waste Survey and summary sheet.

n. For each type of waste state the dates (beginning & ending) such waste was picked up by each Waste Carrier.

See Attachment 2 with the Waste Survey and summary sheet.

o. Provide copies of all documents containing information responsive to the previous seven questions.

See Attachment 4 for copies of waste manifests from 1981 through 1985.

p. Identify (see Definitions) all of each Waste Carrier's employees who collected Respondent's wastes and waste containers.

See Attachment 4 for copies of waste manifests from 1981 through 1985 that indicate the Waste Carrier's employees who collected the wastes.

q. Indicate the ultimate disposal/recycling/treatment location for each type of waste.

We have no documents or information indicating the ultimate disposal/recycling/treatment location for the wastes.

r. Provide copies of all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.

Not applicable - We have no documents or information indicating the ultimate disposal/recycling/treatment location for the wastes.

s. Describe how Respondent managed pickups of each waste, including but not limited to:

i. the method for inventorying each type of waste;

Counted drums or containers.

ii. the method for requesting each type of waste to be picked up;

Phone call to the disposal company requesting a waste pickup.

iii. the identity of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;

We have no documents or information indicating the waste carrier or disposal site employee/agent contacted for pickup of waste.

iv. the amount paid or the rate paid for the pickup of each type of waste;

All documents we have on the amount paid for waste pickup and disposal in included in Attachment 5.

v. the identity of (see Definitions) Respondent's employee who paid the bills; and

We have no documents or information indicating which Varian employee paid the bills. The bills would have been processed and paid by our Accounts Payable department.

- vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.

Payment would have been sent to the respective disposal site.

- t. Identify (see Definitions) the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.

We have no documents or information indicating who selected the disposal locations.

- u. State the basis for and provide any documents supporting the answer to the previous question.

Not applicable.

- v. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions.

See the response to 5.a. above.

6. Respondent's Environmental Reporting: (All questions in this section refer to the period being investigated (1950-1985)).

- a. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Lexington site – MAD053481404.

Burlington site – MAD980910566

- b. Identify (see Definitions) all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

We have copies of 2 documents that were sent to federal offices, a 1980 Notification of Hazardous Waste Activity and a 1981 Hazardous Waste Generator Questionnaire. Neither document indicates the address at the US EPA that received these documents.

c. State the years during which such information was sent/filed.

See response to 6.b. above.

d. Identify (see Definitions) all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

Hazardous Waste Reports (1981 and 1982)
Department of Environmental Quality Engineering
Division of Hazardous Wastes
600 Washington Street - Room 320
Boston, MA 02110

Annual Hazardous Waste Reports (1983 to 1985)
Department of Environmental Quality Engineering
Division of Hazardous Wastes
One Winter Street
Boston, MA 02108

Air Source Registration (1983), Underground Tank Closure Reports (1984-1985)
Department of Environmental Quality Engineering
Metropolitan Boston – Northeast Region
323 New Boston Street
Woburn, MA 01801

e. State the years during which such information was sent/filed.

See response to 6.d. above.

f. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments:

Section 7.12 – Regulations for the Control of Air Pollution
310 CMR 30.000 Hazardous Waste Regulations

g. Identify (see Definitions) the federal and state offices to which such information was sent. Provide the full legal name and mailing address of the Respondent.

See response to 6.d. above.

7. Information Concerning Respondent's Association with the Whitney Barrel Company
(NOTE: All questions in this section refer to the period being investigated (1950-1985)).

a. Please describe Respondent's business association with the Whitney Barrel Company.

We have conducted a diligent search and we were unable to locate any documents or information regarding any business association with the Whitney Barrel Company during the period being investigated (1950-1985). Interviews with longtime employees also do not result in any recollections or information regarding any Association with the Whitney Barrel Company during the period being investigated (1950-1985).

As a result, our response to 7.b. through 7.i. is not applicable.

8. Information About Others

a. If you have information concerning the operation of the Site or the source, content or quantity of materials placed/disposed at the Site which is not included in the information you have already provided, provide all such information.

Not applicable.

b. If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by Respondent, who are able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Not applicable.

c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

See Attachment 3 – Employee data.

9. Compliance with This Request

a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:

- i. the names of all individuals consulted;

See Attachment 3 – Employee data.

- ii. the current job title and job description of each individual consulted;

See Attachment 3 – Employee data.

- iii. the job title and job description during the period being investigated of each individual consulted;

See Attachment 3 – Employee data.

- iv. whether each individual consulted is a current or past employee of Respondent;

See Attachment 3 – Employee data.

- v. the names of all divisions or offices of Respondent for which records were reviewed;

Varian, Inc.'s Lexington, MA manufacturing site and Palo Alto corporate offices.

- vi. the nature of all documents reviewed; and

Hazardous waste manifests, annual waste reports, chemical purchasing documents, and air source registration.

- vii. the locations where those documents reviewed were kept prior to review; and

Varian, Inc.'s Lexington, MA manufacturing site and Palo Alto corporate offices.

- viii. the location where those documents reviewed are currently kept.

Varian, Inc.'s Lexington, MA manufacturing site and Palo Alto corporate offices.

WELLS G & H

ENCLOSURE H - DECLARATION

I declare under penalty of perjury that I am authorized to

respond on behalf of VARIAN, INC. and that the
Respondent

foregoing is complete, true, and correct.

Executed on JAN. 30, 2004



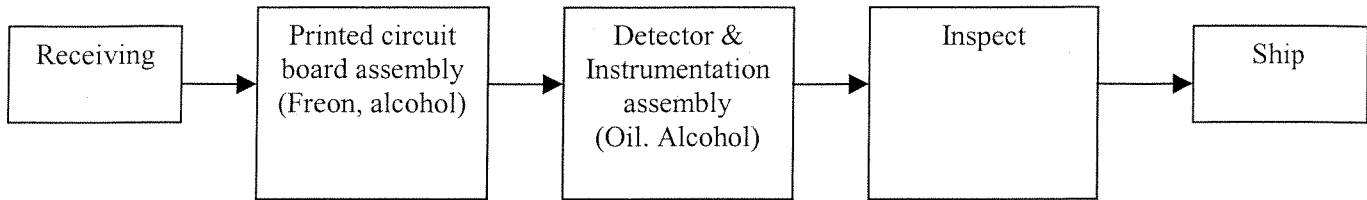
Signature

DAN W. PEIXOTO

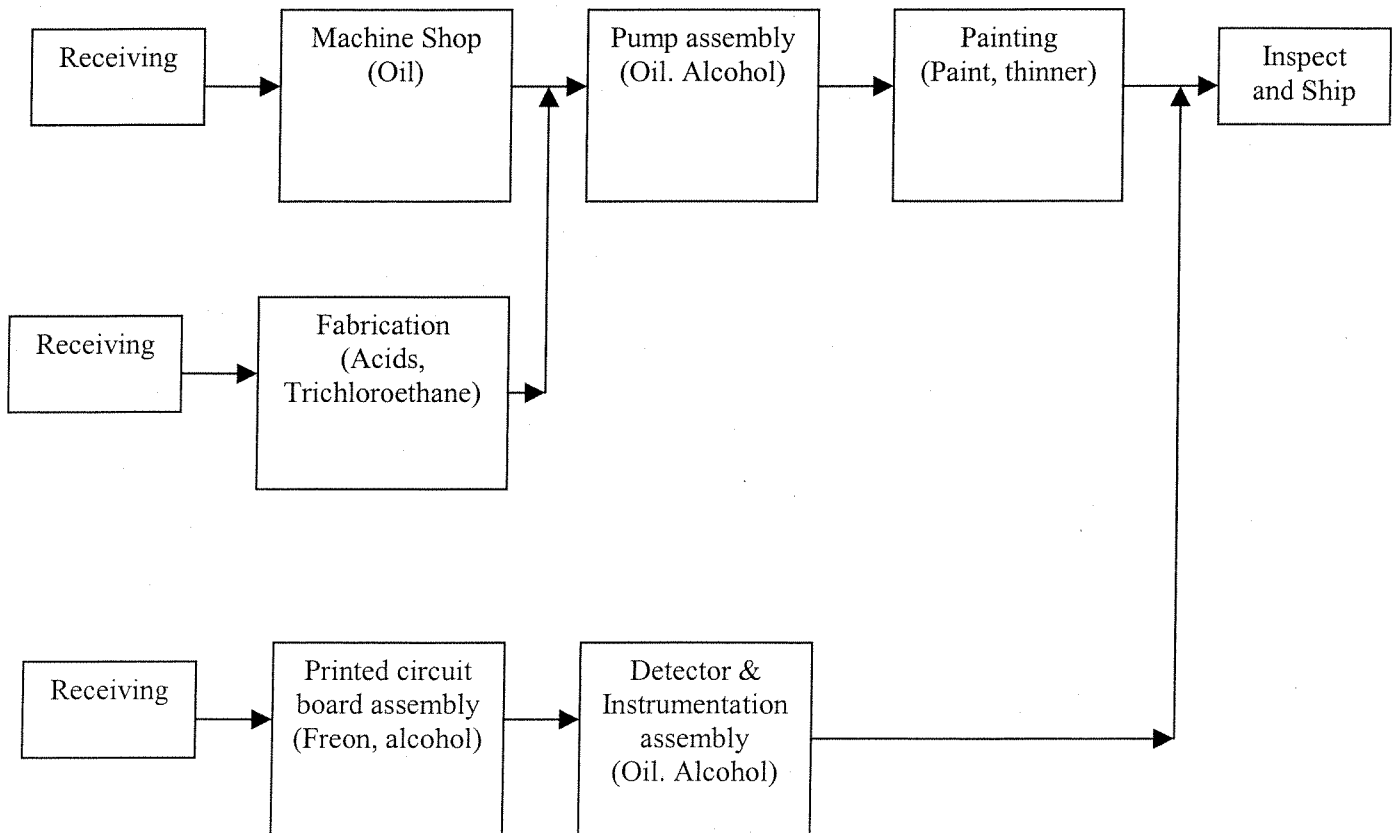
Type Name

CORPORATE ENVIRONMENTAL MANAGER
Title [if any]

ATTACHMENT 1
Burlington Schematic Diagram



Lexington Schematic Diagram



Attachment 2

Completed waste data surveys for the Lexington and Burlington sites and Summary Table

ATTACHMENT 2

Varian Lexington and Burlington Waste Data

Quantities are number of containers (55-gallon drums unless otherwise noted)

	1981 Lexington	1982 Lexington	1983 Lexington	1984 Lexington	1984 Lexington	1985 Lexington	1985 Lexington	1985 Burlington
	All to Interex Natick, MA MAD076590991	All to CWMI Natick, MA MAD980523203	All to CWMI Natick, MA MAD980523203	to CWMI Natick, MA MAD980523203	SCA Services Braintree, MA MAD053452637	CWMI/Clean Harbors Natick, MA MAD980523203	Recycling Industries/SCA Services Braintree, MA MAD053452637	All to CWMI Natick, MA MAD980523203
Waste oil	14	11	23	33		50	14	4
Waste alcohol	9	1	2			1		1
1,1,1- trichloroethane	36	21	11	4	2 + 600 gals bulk	7	2	
Freon	3	5	2	6		3		3
Mercury	1.25 lbs (fiber container)							
Nitric Acid	1	1 (5 gallon pail)		1	1			
Sulfuric acid	3	1 + 4 (1 gallon)						
Hydrofluoric acid	1							
Corrosive liquid (kovar descaler)		15 (1 gallon)						
Corrosive liquid (bright dip)		15 (1 gallon)						
Glacial acetic acid		1 (1 gallon)						
Corrosive liquid (Oakite)					2		2 (30 gal. drums)	
Acid sludge		1 (1 gallon)						
Flux		1		1				
Paint thinner	3	3	5	4		6		
Waste paint		4 (5 gal. pails)	16 (5 gal. pail)					
Lead dross			4 (5 gallon pail)					
Filters with paint solids				4				
Liquid in SpeediDri spill debris					2			

ENCLOSURE E-WASTE SURVEY

Name of Respondent: VARIAN, INC.

Respondent's Location: 121 HARTWELL AVE.
LEXINGTON, MA Date: 1/27/04

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
✓ Acids	LIQUID/55 GAL DRUMS	NITRIC, SULFURIC, HYDROFLUORIC ACIDS	~ 25 GALS/MONTH AVERAGE	INTEREX-STORAGE 1981
Adhesives				
Asbestos				
✓ Adsorbents (from spills, leaks, etc.) (TRUCK CLEANING)	SOLID/55 GAL DRUMS	NITRIC ACID IN SPEEDIDRI	~ 10 GALS/MONTH	1984-SCA SERVICES STORAGE
Automotive Related Wastes:				
Antifreeze				
Batteries				
Brake Fluids				
Degreasers				
Lubricants				
✓ Oils + COOLANTS	LIQUID 55 GAL DRUMS	VACUUM, MACHINE OIL + COOLANTS	~ 60 GALS/MONTH	INTEREX-STORAGE 1981

0068-0038

1/

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
Oil Filters				
Transmission fluids				
other:				
Batteries				
Bleaches				
✓ Caustics/Alkalis	LIQUID 55 GAL + 30 GAL DRUMS	ALKALINE CLEANER	~ 10 GALS MONTH	1984-1985 SCA SERVICES RECYCLING INDUSTRIES, BRANFEE
Chemicals				
Cleaning compounds or fluids				
Coolants				
✓ Degreasers	LIQUID/55 GAL DRUMS	1,1,1 TRICHLOROETHANE	~ 150 GALS MONTH	INTEREX 1981 STORAGE
Disinfectants				
Distillation Byproducts (Still Bottoms)				
Dyes				
Etching Solutions				
Filters				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Flammable, Reactive, or Explosive Materials				
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes				
	Lubricants				
	Metals:				
	grindings				
	powders				
	shavings				
✓	sludges	SOLID, 55 GAL DRUM	ACID SLUDGE	~ 5 GALS/MONTH	1982 - CWHI NITRE STORAGE
	solutions				
	other:				
	Paint and Coating Wastes:				

0068-0040

43

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
✓	paint	5 GALLON PAIRS LARD	PAINT	~25 GALS/MOUTH	1982-1983 CWMF NATEX STORAGE
✓	pigments	DRUMS - SIZE SOLID UNKNOWN	PAINT FILTOS	~20 lbs/MOUTH	1984 CWMF NATEX STORAGE
	stripper				
	stains				
✓	thinner	LIQUID, 55 GAL DRUMS	PAINT THINNER	~15 GALS/MOUTH	1981 INTEREX NATEX STORAGE
	turpentine				
	varnish				
	other:				
	PCBs (polychlorinated biphenyls)				
	Pesticides				
	Photocopying Wastes:				
	toners				
	other:				
	Photography Wastes:				
	developers				
	fixers				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	other:				
	Plating Solutions				
	Pretreatment Sludges/Solutions (sewage)				
	Printing Wastes:				
	inks				
	dyes				
	other:				
	Rags, Used (Indicate prior use)				
	Rodenticides				
	Septic System Wastes				
	Sludges				
✓	Soldering Solutions	LIQUID 55 GAL DRUM	FLUX	~5 GALS/MO	1982-1984, CWWF NATAL
	Solutions of Polymers, resins, plastics				
	Solvent Extracts				

0068-0042

LS

[illegible]

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
✓	THINNER	LIQUID/55 GAL DRUMS	PAINT THINNER	~ 20 GALS/MONTH	1982-1984 CWMF NATICK STORAGE
✓	THINNER	LIQUID/55 GAL DRUMS	PAINT THINNER	~ 25 GALS/MONTH	CWMF/CLEAN HARBOR NATICK 1985
✓	SOLVENTS	LIQUID/55 GAL DRUMS	FREON	~ 20 GALS/MONTH	1982-1984 CWMF NATICK STORAGE
✓	SOLVENTS	LIQUID/55 GAL DRUMS	FREON	~ 15 GALS/MONTH	CWMF/CLEAN HARBOR NATICK STORAGE 1985
✓	SOLVENTS	LIQUID/55 GAL DRUMS	ALCOHOL	~ 40 GALS/MONTH	1981-INTEREX NATICK STORAGE
✓	SOLVENTS	LIQUID/55 GAL DRUMS	ALCOHOL	~ 5 GALS/MONTH	1982-1984 CWMF NATICK STORAGE
✓	SOLVENTS	LIQUID/55 GAL DRUMS	ALCOHOL	~ 5 GALS/MONTH	1985 CWMF/CLEAN HARBOR NATICK STORAGE

0068-0044

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
✓	ACIDS	LIQUID 55 GAL DRUMS, 1 GAL BOTTLES	SULFURIC, NITRIC, HYDROCHLORIC ACIDS	~ 6 GALS/MONTH AVERAGE	1982-1984 CWMF - NATICK STORAGE
✓	ACIDS	LIQUID 55 GAL DRUMS	NITRIC ACID	~ 5 GALS/MONTH	1984 SCA SERVICES - STORAGE
✓	OILS + COOLANTS	LIQUID 55 GAL DRUMS	COOLANTS, VACUUM + MACHINING OILS	~ 100 GALS/MONTH AVERAGE	1982-1984 NATICK - CWMF - STORAGE
✓	OILS + COOLANTS	LIQUID 55 GALLON DRUMS	COOLANTS, VACUUM + MACHINING OILS	~ 240 GALS/MONTH	1985 - CWMF/CLEAN HARBORS NATICK - STORAGE
✓	OILS + COOLANTS	LIQUID 55 GALLON DRUMS	COOLANTS, VACUUM + MACHINING OILS	~ 70 GALS/MONTH	1985 - SCA SERVICES BRANTREE - STORAGE
✓	DEGREASERS	LIQUID 55 GALLON DRUMS	1,1,1 TRICHLOROETHANE	~ 55 GALS/MONTH	1982-1984 CWMF NATICK - STORAGE
✓	DEGREASERS	LIQUID 55 GALLON DRUMS	1,1,1 TRICHLOROETHANE	~ 30 GALS/MONTH	1985 CWMF/CLEAN HARBORS NATICK - STORAGE
✓	DEGREASERS	LIQUID 55 GALLON DRUMS + BULK	1,1,1 TRICHLOROETHANE	~ 40 GALS/MONTH	1984-1985 SCA SERVICES BRANTREE - STORAGE

ENCLOSURE E-WASTE SURVEY

Name of Respondent: VARDAN, INC.

Respondent's Location: 78 BLANCHARD RD
BURLINGTON, MA Date: 1/27/04

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
Acids				
Adhesives				
Asbestos				
Adsorbents (from spills, leaks, etc.)				
Automotive Related Wastes:				
Antifreeze				
Batteries				
Brake Fluids				
Degreasers				
Lubricants				
Oils				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
Oil Filters				
Transmission fluids				
other:				
Batteries				
Bleaches				
Caustics/Alkalis				
Chemicals				
Cleaning compounds or fluids				
Coolants				
Degreasers				
Disinfectants				
Distillation Byproducts (Still Bottoms)				
Dyes				
Etching Solutions				
Filters				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-91).
Flammable, Reactive, or Explosive Materials				
Fungicides				
Herbicides				
Insecticides				
Insulating/Fire Proofing Materials				
Laboratory Wastes				
Lubricants				
Metals:				
grindings				
powders				
shavings				
sludges				
solutions				
other:				
Paint and Coating Wastes:				

0068-0048

B3

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
paint				
pigments				
stripper				
stains				
thinner				
turpentine				
varnish				
other:				
PCBs (polychlorinated biphenyls)				
Pesticides				
Photocopying Wastes:				
toners				
other:				
Photography Wastes:				
developers				
fixers				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				
inks				
dyes				
other:				
Rags, Used (Indicate prior use)				
Rodenticides				
Septic System Wastes				
Sludges				
Soldering Solutions				
Solutions of Polymers, resins, plastics				
Solvent Extracts				

0068-0050

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).

September 15, 2005

Varian, Inc.
3120 Hansen Way, MS D-217
Palo Alto, CA 94304-1070 USA
Phone: 650-424-4710
Fax: 650-856-8356
dan.peixoto@varianinc.com

United States Environmental Protection Agency
Martha Bosworth, Enforcement Coordinator
Office of Site Remediation and Restoration (HBS)
One Congress Street, Suite 1100
Boston, MA 02114



RECEIVED

ATTN: Wells G&H Case Team

SEP 19 2005

Dear Ms. Bosworth,

**OSRR
Search & Cost Recovery Section**

Attached is the Varian, Inc. response to the Whitney Barrel Company Supplemental Request for Information dated August 16, 2005.

In preparing this response, we conducted a thorough inquiry into our operations during the period in question (i.e., 1983 to 1985). As we previously reported to you in response to EPA's letter covering the period of 1950 to 1985, we were unable to document any use of the Whitney Barrel site during the period of 1983 to 1985. In the interest of full disclosure, we did locate records indicating that empty drums may have been picked up from our Lexington, Massachusetts facility by Whitney Barrel during the 1990's.

In addition, we request that EPA provide us with copies of any documents or other information that EPA possesses which indicates that Varian and Whitney Barrel Company may have had a business relationship before 1986. This could assist us in conducting further inquiries to identify information that may be responsive to your Supplemental Request for Information.

If you have any questions concerning the information provided or if you require any additional information, please feel free to contact me. My telephone number is 650-424-4710, facsimile number is 650-856-8356, and e-mail address is dan.peixoto@varianinc.com.

Sincerely,

Dan W. Peixoto
Corporate Environmental Manager

0068-0098

WELLS G & H SUPERFUND SITE
SUPPLEMENTAL 104(e) QUESTIONS FOR
VARIAN, INC.

Period Being Investigated: 1983 to 1985

Note: All questions refer to the period being investigated unless otherwise indicated.

INFORMATION REQUEST QUESTIONS

Respondent's Wastes and Waste Streams (including By-Products)

1. You stated in your 104(e) response that Varian used its empty drums to store hazardous wastes. Please describe the process you used, if any, to clean these "empty" drums prior to use for hazardous waste storage. Please describe how you disposed of any emptied materials and/or rinse water from these drums.

Based on interviews with longtime employees, the "empty" drums were not cleaned prior to use for hazardous waste storage.

2. You stated in your 104(e) response to Question 4c(iii) that "information (chemical names, labels, etc.) on drums emptied at the site would be painted over or otherwise removed before using the container for waste collection and disposal." Please describe what is meant by your reference to "drums that were 'emptied' at the site."

"Drums that were 'emptied' at the site" refers to drums containing fresh chemicals (oils, paint thinner, alcohols, acetone, coolant, etc.) that we obtained from our chemical supplier (Service Chemical, 221 Sutton Street North Andover, MA 01845). We "emptied" these drums by using up the chemicals these drums contained in the regular course of our manufacturing processes (cleaning, painting, metal machining, pump manufacturing, etc.).

Information Concerning Respondent's Association with Whitney Barrel

As we explained in our January 30, 2004 response, we have conducted a diligent search and we were unable to locate any documents or information regarding the shipment of used containers or any other business association with the Whitney Barrel Company during the period being investigated (1983-1985). Interviews with longtime employees also do not result in any recollections or information regarding the shipment of used containers or other business association with the Whitney Barrel Company during the period being investigated (1983-1985).

As a result, our response to 1.a through 1.i. is Not Applicable.

Information Concerning Respondent's Association with any other Drum Reconditioning and/or Recycling Companies

1. State whether Respondent sent/delivered containers to any other drum reconditioning/recycling company, including but not limited to, Edward C. Whitney & Son, Inc. (also known as E. C. Whitney), Kingston Steel Drum/Great Lakes Container Corporation (now known as Mallinckrodt, Inc.), Kingsland Drum Company, Roche Brothers Barrel and Drum Co., Roy Brothers, Inc., Ryan Barrel Company, Inc., and Woburn Barrel.

As we explained in our January 30, 2004 response, we have no documents or information concerning the shipment of empty containers to any drum reconditioning/recycling companies for the period being investigated (1983-1985).

Our longtime employees recall that many of the empty drums were returned, with and without deposit, to the supplier (Service Chemical, 221 Sutton Street North Andover, MA 01845).

Service Chemical was (and still operates as) a supplier of specialty and commodity chemicals, not a drum reconditioning/recycling company. As a result, our response to 2.a through 2.g is Not Applicable.

Compliance with this Request

Note: All questions in this section refer to the present time unless otherwise indicated.

1. Describe all sources reviewed or consulted in responding to this request and all individuals who have any knowledge of, or information about, the subject matter of any of the foregoing questions, including but not limited to:

- a. The name of each individual;

See Attachment 3 to our January 30, 2004 response - Employee data (copy attached).

- b. The current job title and job description of each individual;

See Attachment 3 to our January 30, 2004 response - Employee data (copy attached).

- c. The job title and job description during the period being investigated of each individual;

See Attachment 3 to our January 30, 2004 response - Employee data (copy attached).

- d. Whether each individual is a current or past employee of Respondent;

See Attachment 3 to our January 30, 2004 response - Employee data (copy attached).

- e. A description of the types of information the individual possesses (i.e. specific information on company operations, wastes generated, and/or waste disposal practices);

During the period being investigated, the responsibility for the collection and management of the wastes was not assigned to any one person; it was handled by the manufacturing departments that generated the wastes and the maintenance and facilities departments. The employees listed in Attachment 3 to our January 30, 2004 response - Employee data (copy attached) were employed in those departments and had varying levels of waste disposal responsibilities as part of their overall duties. These employees recall shipping hazardous wastes for proper disposal in the 1970s and the use of manifests starting in 1981, as required under RCRA for the shipment of hazardous wastes. However, these employees have no recollection of any dealings with Whitney Barrel Company or any other drum reconditioning/recycling company during the period being investigated.

- f. The names of all divisions or offices of Respondent for which records were reviewed;

Varian, Inc.'s Lexington, MA manufacturing site and Palo Alto, CA corporate offices.

- g. The nature of all documents reviewed;

Hazardous waste manifests, annual waste reports, chemical purchasing documents, and air source registration.

- h. The locations where those documents reviewed were kept prior to review: and

Varian, Inc.'s Lexington, MA manufacturing site and Palo Alto, CA corporate offices.

- i. The location where those documents reviewed are currently kept

Varian, Inc.'s Lexington, MA manufacturing site and Palo Alto, CA corporate offices.

ATTACHMENT 3
Employee Data

Varian Vacuum Technologies

Name	Yr Started	Title 1985	Supv 1985	Current Title	Current Supv.	Phone #
Mark Baribeault	1974	Assembly Supervisor - B General supervision of Leak Job Desc. Det. Assy.	Dennis Farrell	Mgr. QA & Customer Care Responsible for total quality management, customer care, and internal & external service.	Fred Campbell	781-860-5447
Carl Brooks	1973	Sr. Maintenance Mechanic Construct, maintain & repair Job Desc. facility and it's related equipment	Frank Nocella	Sr. Maintenance Mechanic Construct, maintain & repair facility and it's related equipment	Ken Egan	781-861-7200 x5527
Tim Clough	1991	N/A Job Desc.	N/A	Environmental Compliance Administrator Responsible for the administration of all environmental matters.	Mark Baribeault	781-860-5415
Bill Salter	1973	All Around Machinist & Lead Provides working guidelines to Job Desc. a group of machinists. Also performs similar work as that of the group.	Mike Lonergan	Machinist Journey Level Provides machining for close tolerance parts as required by supervisor.	Jim Ruggeri	781-860-5487
Paul Latino	1980	Dispatcher Plan department work Job Desc. schedule within the framework of the plant production schedule.	Dennis Farrell	Team Leader Provides working guidelines to a group of employees. Also performs similar work as that of the group.	Tom Branchaud	781-861-7200 x5533
Ed Jackson	1977	Welder Fabricator Provides welding Job Desc. manufacturing support as directed by the supervisor	Ron Berna	Welder Fabricator Provides welding manufacturing support as directed by the supervisor	Jim Ruggeri	781-860-5486

Notes:

Frank Nocella Manager of Facilities, retired in 2/1989
Dennis Farrell and Ron Berna no longer work at Varian.

0068-0102

January 30, 2007

United States Environmental Protection Agency
Martha Bosworth, Enforcement Coordinator
Office of Site Remediation and Restoration (HBS)
One Congress Street, Suite 1100
Boston, MA 02114

VARIAN

ATTN: Wells G&H Case Team

Re: Supplemental Request for Information in relation to the former Whitney Barrel Company
at the Wells G&H Superfund Site in Woburn, Massachusetts

Dear Ms. Bosworth:

This letter and the attached information are Varian, Inc.'s response to the EPA's Supplemental Request for Information dated January 4, 2007.

In response to that Supplement Request, we reviewed the documents provided by the EPA and conducted a thorough investigation using the information in those documents. Our investigation included a review of documents and interviews of employees available to Varian, Inc. (see the attached updated Attachment 3(a) identifying employees interviewed). Despite that investigation and the additional information provided by the EPA, we have been unable to verify the Whitney Barrel Company transactions suggested by the documents provided by the EPA. We were also unable to obtain any further information to supplement the responses submitted to the EPA in our January 30, 2004 and September 15, 2005 letters.

However, as requested by the EPA in its Supplemental Request, we are providing (see attachments) all available documents relating to our Lexington facility's dealings with Edward C. Whitney & Son in Wilmington, Massachusetts (all during the period 1990 to 2001).

We also provide the following additional information: In all but one case, the documents provided by the EPA with its Supplemental Request reference "Varian" generally without reference to a specific Varian facility. The one exception is document number 5000-0387, which references "Varian Beverly."

During the time period referenced in these documents (1983 to 1985), there were four facilities in Massachusetts that were owned or operated by Varian Associates, Inc. ("VAI"). These facilities were:

- 121 Hartwell Avenue, Lexington,
- 78 Blanchard Road, Burlington,
- 35 Dory Road, Gloucester, and
- 150 Sohier Road, Beverly.

Described below is relevant information on each of these facilities (which is also summarized in an attached chart).

Lexington and Burlington Facilities

As we explained in our initial response to the EPA, on April 2, 1999 VAI was divided into three separate companies in a double "spin off" transaction. Varian, Inc. (Respondent) was one of those "spin-off" companies, and Varian Semiconductor Equipment Associates, Inc. ("VSEA") was the other. VAI then changed its name to Varian Medical Systems, Inc. ("VMS"). All three of these companies -- Varian, Inc., VSEA and VMS -- are, and have been since April 2, 1999, completely unrelated, separate public companies.

This "spin-off" transaction was accomplished under the terms of a Distribution Agreement pursuant to which Varian, Inc. (Respondent) received all of the assets at, and assumed from VAI all of the liabilities for, the facility at 121 Hartwell Avenue, Lexington, Massachusetts (which is still operated by Varian, Inc.). (Varian, Inc. also assumed from VAI all of the liabilities for the former facility at 78 Blanchard Road, Burlington, Massachusetts -- which was exited by VAI in 1989.)

The EPA's original Request for Information (dated December 15, 2003) was sent to Varian, Inc.'s Lexington facility and corporate offices at 3120 Hansen Way, Palo Alto, California. Varian, Inc. responded to that Request and the EPA's Supplemental Requests as they relate to the Varian, Inc. operations at the Lexington and former Burlington facilities.

Gloucester Facility

Under that same Distribution Agreement, VSEA received all of the assets at, and assumed from VAI all of the liabilities for, the facility at 35 Dory Road, Gloucester, Massachusetts (which is still operated by VSEA).


Beverly Facility

On August 11, 1995, VAI sold its Electron Devices Business to Communications & Power Industries, Inc. The Beverly facility was included in the assets of the business sold to CPI (which still operates the Beverly facility). Any documents that might relate to the Beverly facility's dealings with the Whitney Barrel Company would be in the custody or control of CPI.

CPI, VSEA and/or VMS (successor to VAI) might have documents or access to current or former employees that could help determine which "Varian" facilities were referenced in the documents provided by the EPA or might otherwise be able to provide information to the EPA on "Varian" dealings with the Whitney Barrel Company.

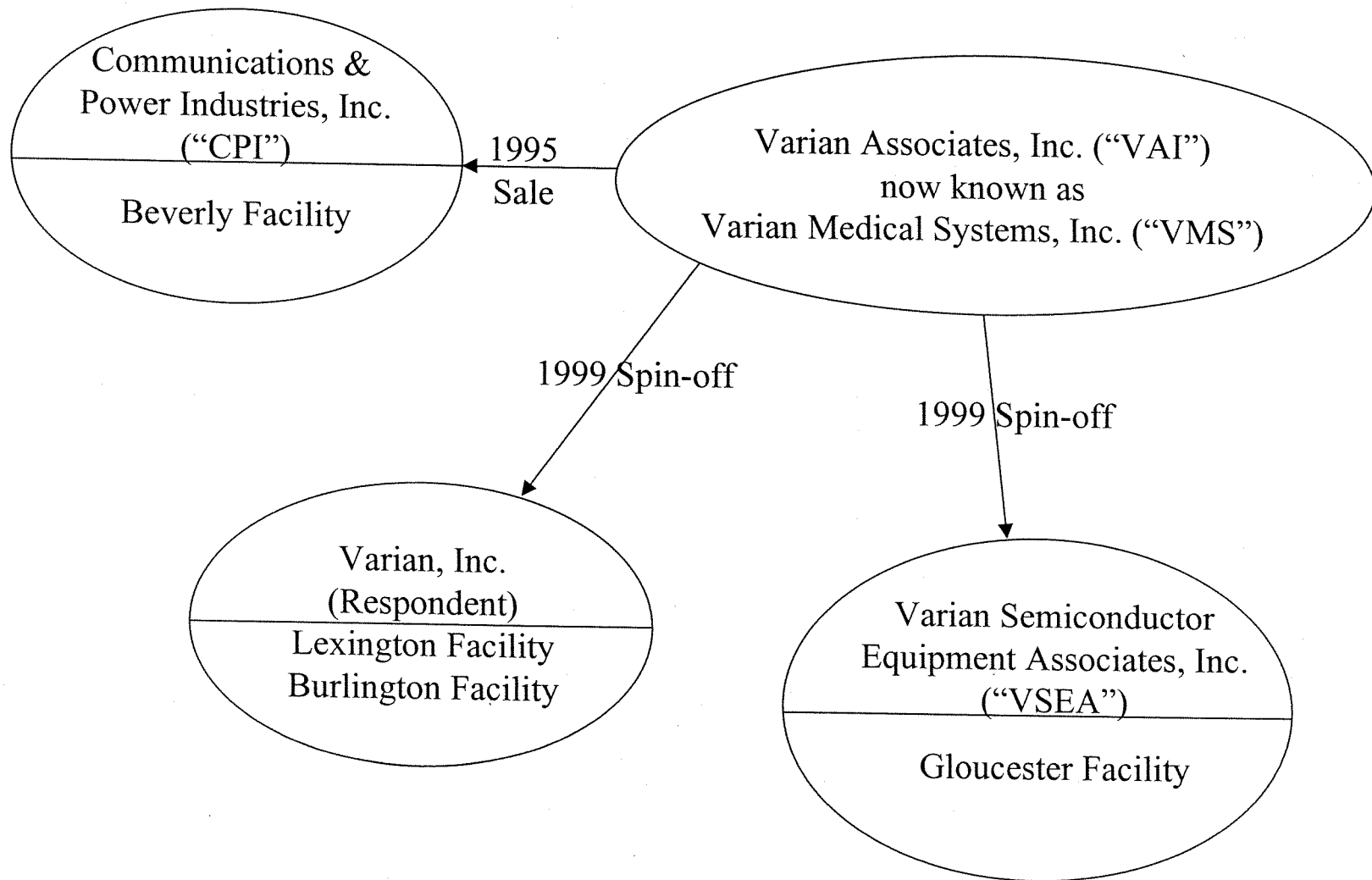
If you have any questions concerning the information provided or if you require any additional information, please feel free to contact me. My telephone number is 650-424-4710, facsimile number is 650-856-8356, and e-mail address is dan.peixoto@varianinc.com.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dan Peixoto", is written over a faint horizontal line.

Dan Peixoto
Corporate Environmental Manager

Attachments



Attachment 3(a)
Supplemental Employee Data

Name	Year Started	1985 Title and Job Description	Supervisor in 1985	Current Title	Current Supervisor	Phone Number
Tim Moran	2003	Not applicable	Not applicable	Varian Lexington Controller	Fred Campbell	1.781.860.5408
Irwin Patterson	1984	Manager Cost Accounting and Budgets	Frank Dooley	Human Resources Manager	Fred Campbell	1.781.860.5422
Paul Abel	1979	Staff Accountant	John Hoag	Accounting Manager	Tim Moran	1.781.860.5408

All available documents related to Varian Lexington's business with the
Edward C. Whitney & Son Wilmington, MA site
1990 to 2001

VARIAN

Page 1 of 1

Varian Vacuum Technologies

ORDER / REV DATE	NO. 344	ORD P. 10	NUMBER
Oct 31, 2001	0920	VO	1015591

ORDER NUMBER, LINE NUMBER, BUSINESS UNIT NAME,
AND OUR PART NUMBER MUST APPEAR ON ALL INVOICE
SHIPPING DOCUMENTS, PACKAGES AND CORRESPONDENCE.

CONFIRMING TO	FOB	INQUIRIES TO	TELEPHONE	CURRENCY
		Do not assign		USD
SUPPLIER NAME		SHIP TO		
658814 EDWARD C. WHITNEY & SON, INC PO Box 474 WILMINGTON MA 01887		121 Hartwell Ave Lexington, MA 02421		
		INVOICE TO		
		P.O. Box 9197 Lexington, MA 02420-9197		
		TERMS		
		Within 30 days Due net		
Tel. 617 658-8151, fax		DELIVERY DATE Oct. 31, 2001		

ITEM	VARIAN PART NO	BOM REV	DESCRIPTION	UNIT PRICE	EXTENDED VALUE
	ORDER QUANTITY	PER			

CREATED BY: TCLOUGH
 CREATED ON: 20011031
 CHANGED BY:
 CHANGED ON: 00000000
 INVOICE: VARIAN VACUUM TECHNOLOGIES, P.O. BOX 9197 LEXINGTON, MA 0242
 PHONE: 781-860-5415
 ATTENTION:

010			17H OPEN HEAD 55 GAL. DRUMS		
	4.000	Each	20.00	80.00	USD
Delivery date Oct. 31, 2001					
THIS ITEM IS TAXABLE.					

NET VALUE EXCL. TAX 80.00 USD
 =====

SUPPLIER INFORMATION - PLEASE READ CAREFULLY

SUPPLIER ACKNOWLEDGEMENT NOT REQUIRED, UNLESS REQUESTED
 BY BUYER.
 PLEASE NOTIFY BUYER IN WRITING, OF ANY CHANGE TO THIS CONTRACT.

1. INVOICE EACH SHIPMENT SEPARATELY.

- DECLARED VALUE: (A) DO NOT DECLARE VALUE IN EXCESS OF CARRIER'S LIABILITY.
(B) IF FREIGHT RATES ARE BASED ON RELEASED VALUE, USE LOWEST RELEASED VALUE.

3. INSURANCE:

- (A) INSURE U.S. POSTAL SHIPMENTS.
 (B) DO NOT INSURE COMMON CARRIER SHIPMENTS.

PURCHASING DEPARTMENT APPROVAL

NOTE: ALL CHANGES MUST BE AUTHORIZED BY BUYER ONLY.
 SUPPLIERS WHO INCUR EXPENSES NOT AUTHORIZED BY
 BUYER, DO SO AT THEIR OWN RISK.

AUTHORIZED BY: VARIAN, Inc.

THIS ORDER IS GIVEN SUBJECT TO THE TERMS
 AND CONDITIONS ON THE REVERSE SIDE HEREOF.

12/02/1996

0068-0129

0068-0130

5:24PM

VARIAN ACCTS PAYABLE

NO. 343

3.1

FOUNDED 1908

860-5/14

EDWARD C. WHITNEY & SON, INC.

STEEL • DRUMS • FIBRE

Bought & Sold

New & Reconditioned

PLANT: 888 WOBURN ST., WILMINGTON, MASS.-(508) 658-8151

MAIL ADDRESS: P.O. BOX 474, WILMINGTON, MASS. 01887

Customer's Order No.		007253		Date	11/5		19
Name Varian Vacuum Products							
Address 121 Hartwood Ave Lexington, Ma 02173							
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.	MOSE. RETD.	PAID OUT
QUAN.	DESCRIPTION					PRICE	AMOUNT
6	55 gal. EX DH NEW						
2	MT. THUMB TO SHRED						
All claims and returned goods MUST be accompanied by this bill.						TAX	
17791 Received By <i>Tim Cough</i>						TOTAL	

The seller guarantees the merchandise sold under this certificate to the extent of its value, but the seller is not liable for any damages resulting from its use.

EMPTY DRUM CERTIFICATE

I hereby certify that these drums are "empty" as that term is defined in the National Environment Protection Agency regulations, 40 CFR 261.7, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29."

*With regards to most regulated residues, EPA's 40 CFR 261.7 says "A container is empty if:

(i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating, and

(Q) No more than 2.5 Centimeters (one inch) remains on the bottom of the container
EPA has explained this rule saying "that one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale of this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 281.33(e), EPA says the container is empty only "if the container . . . has been triple-rinsed using a solvent capable of removing the product, or has been cleaned by another method shown to achieve equivalent removal."

"DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of it's original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private carrier. DOT placarding is not required for vehicles carrying empty containers.

4049 11/27/1961

0068-0131

JAN.15.2004 5:34PM

VARIAN ACCTS PAYABLE

NO.344

P.9

SF10-1 B/U 092

VARIAN SHORT FORM PO

03/20/95

INVOICE: P. O. BOX 10022 PALO ALTO, CA 94303-0922

ORD BY: T.CLOUGH

B/U : 092 VACUUM PRODUCTS

ORD: 03/20/95

PHONE: 617 861 - 7200 x 5415

RESP: 09235

CHG:

ORDER: 01816E

STATUS: 2 OPEN (RELEASED)

AUTH: T.CLOUGH

TAXABLE: Y

DELIVER TO: T. CLOUGH

JO/ACCT: 321

VENDOR: ~~EDWARD C. WHITNEY & SONS, INC.~~

PO BOX 474

WILMINGTON, MA

VEN#: 658814

01887

ATTN:

PHONE: ~~617~~ 658 - 8151 x

ITEM	QTY	PRICE	DESCRIPTION	TOTAL
1	8	\$19.00	17H DRUMS 55 GAL.	\$152.00

GRAND TOTAL: \$152.00

UPDATE COMPLETE

PF11-SF20 PF12=EXIT

SCR: SF10

TXN (A,C,I,R,X): A

ORDER: 01816E

ESTABLISHED
1908

STEEL DRUM PICKUP REPORT

EDWARD G. WHITNEY & SONS, INC.

888 WOBURN ST. - WILMINGTON, MASS. 01897

TEL. (617) 658-8151

NO. 8784

FROM

DATE

10-25-90

QUANTITY	STEEL DRUMS PICKED UP	UNIT	AMOUNT
10	55 GAL. MT. 5 to 10 ASH		
	55 GAL. CH #2		
	55 GAL. DH #2		
	55 GAL. DH #2		
	55 GAL. 17H		
	30 GAL. OH		
	30 GAL. CH		
	LARGE FIBRE		
	SMALL FIBRE		

BRADY BUSINESS FORMS - LOWELL, MASS. TEL. 450-9555

DRIVER'S SIGNATURE

ESTABLISHED
1908

STEEL DRUM PICKUP REPORT

EDWARD C. WHITNEY & SONS, INC.

NO 8333

888 WOBURN ST. - WILMINGTON, MASS. 01887
TEL. (617) 658-8151

FROM

DATE

121 HASTINGS AVE

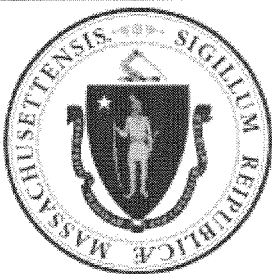
WILMINGTON, MA

Sub. Tel. M. N. 415

QUANTITY	STEEL DRUMS PICKED UP	617-967-7200	XMIT 5415	MOUNT
9	55 GAL. CH #1			
	55 GAL. CH #2			
	55 GAL. OH #1			
	55 GAL. OH #2			
4	55 GAL. OH #1			
	30 GAL. OH			
	30 GAL. CH			
	LARGE FIBRE			
	SMALL FIBRE			

BRAD BUSINESS FORMS, LOWELL, MASS. TEL. 460-9500

DRIVERS SIGNATURE



The Commonwealth of Massachusetts
William Francis Galvin

Secretary of the Commonwealth, Corporations Division
One Ashburton Place, 17th floor
Boston, MA 02108-1512
Telephone: (617) 727-9640

VARIAN, INC. Summary Screen

Help wit

[Request a Certificate](#)

The exact name of the Foreign Corporation: VARIAN, INC.

Entity Type: Foreign Corporation

Identification Number: 770501995

Old Federal Employer Identification Number (Old FEIN): 000648884

Date of Registration in Massachusetts: 02/18/1999

The is organized under the laws of: State: DE Country: USA on: 01/07/1999

Current Fiscal Month / Day: 09 / 30

Previous Fiscal Month / D

The location of its principal office:

No. and Street: 3120 HANSEN WAY, D-194

City or Town: PALO ALTO

State: CA

Zip: 94304

Country:

The location of its Massachusetts office, if any:

No. and Street: 121 HARTWELL AVE.

City or Town: LEXINGTON

State: MA

Zip: 02421-3133

Country:

Name and address of the Registered Agent:

Name: C T CORPORATION SYSTEM

No. and Street: 155 FEDERAL STREET

STE 700

City or Town: BOSTON

State: MA

Zip: 02110

Country:

The officers and all of the directors of the corporation:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code	Ex c
SVP, GENERAL COUNSEL & SECRETARY	ARTHUR W HOMAN	3120 HANSEN WAY D-194 PALO ALTO, CA 94304 USA	
CHAIRMAN OF THE BOARD	ALLEN J LAUER	3120 HANSEN WAY D-194	

		PALO ALTO , CA 94304 USA	
PRESIDENT & CEO	GARRY W ROGERSON	3120 HANSEN WAY D-194 PALO ALTO, CA 94304 USA	
ASSISTANT SECRETARY	GERALD T MUGNOLO	3120 HANSEN WAY D-194 PALO ALTO, CA 94304 USA	
SVP, CFO & TREASURER	G. EDWARD MCCLAMMY	3120 HANSEN WAY D-194 PALO ALTO, CA 94304 USA	

business entity stock is publicly traded: ☒ X

The total number of shares and par value, if any, of each class of stock which the business entity is authorized to issue:

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		Num of Shares	Total Par Value	
CWP	\$0.01000	99,000,000	\$990,000.00	30,870,000
PWP	\$0.01000	1,000,000	\$10,000.00	0

☐ Consent ☐ Manufacturer ☐ Confidential Data ☐ Does Not Require Annual Report
☐ Partnership ☐ Resident Agent ☐ For Profit ☐ Merger Allowed

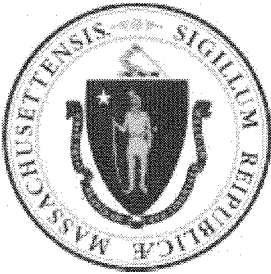
Select a type of filing from below to view this business entity filings:

ALL FILINGS
 Amended Foreign Corporations Certificate
 Annual Report
 Annual Report - Professional
 Application for Reinstatement

View Filings

New Search

Comments



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$100.00

Secretary of the Commonwealth
 One Ashburton Place, Boston, Massachusetts 02108-1512
 Telephone: (617) 727-9640

Annual Report

(General Laws, Chapter 156D, Section 16.22; 950 CMR 113.57)

Federal Employer Identification Number: 770501995 (must be 9 digits)1. Exact name of the corporation: VARIAN, INC.2. Jurisdiction of Incorporation: State: DE Country: USA

3,4. Street address of the corporation registered office in the commonwealth and the name of the registered agent at that office:

Name: C T CORPORATION SYSTEMNo. and Street: 101 FEDERAL STREETCity or Town: BOSTONState: MAZip: 02110Country: USA

5. Street address of the corporation's principal office:

No. and Street: 3120 HANSEN WAY, D-194City or Town: PALO ALTOState: CAZip: 94304Country: USA

6. Provide the name and business street address of the officers and of all the directors of the corporation:

(A president, treasurer, secretary and at least one director are required.)

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
SVP, GENERAL COUNSEL & SECRETARY	ARTHUR W HOMAN	3120 HANSEN WAY D-194 PALO ALTO, CA 94304 USA
ASSISTANT SECRETARY	GERALD T MUGNOLO	3120 HANSEN WAY D-194 PALO ALTO, CA 94304 USA
SVP, CFO & TREASURER	G. EDWARD MCCLAMMY	3120 HANSEN WAY D-194 PALO ALTO, CA 94304 USA
CHAIRMAN OF THE BOARD	ALLEN J LAUER	3120 HANSEN WAY D-194 PALO ALTO, CA 94304 USA
PRESIDENT & CEO	GARRY W ROGERSON	3120 HANSEN WAY D-194 PALO ALTO, CA 94304 USA

7. Briefly describe the business of the corporation:

MANUFACTURER OF ANALYTICAL INSTRUMENTS

8. Capital stock of each class and series:

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding
		<i>Num of Shares</i>	<i>Total Par Value</i>	<i>Num of Shares</i>
CWP	\$0.01000	99,000,000	\$990,000.00	30,870,000
PWP	\$0.01000	1,000,000	\$10,000.00	0

9. Check here if the stock of the corporation is publicly traded: X

10. Report is filed for fiscal year ending: 09/30/ 2006

Signed by GERALD T. MUGNOLO , its OTHER OFFICER
on this 4 Day of December, 2006